

## **"What if?"**

**Randy** was working on the product development team for a new enhanced service. He is sure that knowing how many of our customers have purchased call forwarding would be helpful in proving the need for this new enhanced service. He wants to know if this information should be obtained directly from his contact in the Network organization.

What should your reply be to Randy?

### **Your "What If?" reply should be similar to ...**

This information is Aggregated CPNI. Since he needs the information to evaluate the market size for an Enhanced Service, he must follow the rules for accessing Aggregated CPNI. Call Forwarding penetration is not an Aggregated CPNI report that U S WEST has agreed to provide in our initial ONA filing. **Randy** needs to submit a written request for the information to the Aggregated CPNI coordinator.

If the decision is made to provide the information to him, it will then be available to all Enhanced Service and CPE Providers on equal terms and conditions.



Refer questions to your Supervisor.

For additional **Aggregated CPNI** information contact the Aggregated CPNI Coordinator.

## **(D) NONDISCRIMINATORY PROVISIONING**

U S WEST employees must not discriminate in the provisioning of basic network services provided to Enhanced Service or CPE Providers.

US WEST commits to:

**\* technical parity**

Standardized hardware and software interfaces to the basic network will be used when U S WEST offers enhanced services or CPE. All enhanced service and CPE Providers will be able to utilize these same basic network interfaces.

**\* equal technical characteristics for basic services**

U S WEST must provide basic services with equal technical characteristics to both internal (U S WEST) and external Providers.

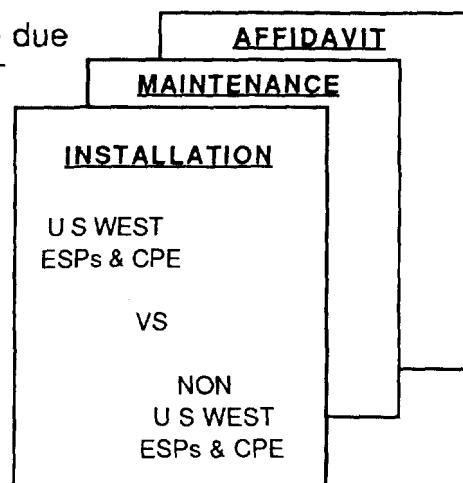
**\* an equal level of installation, maintenance and repair service**

The intervals or time periods to perform these functions must be the same for both internal (U S WEST), and external Providers.

To demonstrate that we are providing the same level of service to all Providers - internal and external - U S WEST must issue **quarterly reports to the FCC comparing the level of service provided to external Providers with the level it provides its own internal U S WEST Providers.**

The INSTALLATION REPORT compares the due date performance on orders for U S WEST Enhanced Service and CPE Provider operations with those of Non U S WEST Providers.

The MAINTENANCE REPORT compares the time it takes to clear trouble for internal versus external Enhanced Service and CPE Providers.



Annual **Affidavits**, must be signed by a U S WEST Officer(s), and filed with the FCC attesting that no discrimination has occurred in the provisioning, installation or quality of U S WEST basic network services.

## "What do I have to do?"

All Employees	<ul style="list-style-type: none"> <li>* I will not show any preference or priority for our internal U S WEST Enhanced Service or CPE Provider operations over external Enhanced Service or CPE Providers in performing my job duties.</li> </ul>
VSC Order Processors, Service Representatives and MU Sales personnel.	<ul style="list-style-type: none"> <li>* I will give the same treatment to all Enhanced Service and CPE Providers on their service orders and will apply standard due dates for the provisioning of network services.</li> </ul>
<p>Technicians</p> <p>Loop Assignment Center</p> <p>Circuit Provisioning Center</p> <p>Installation and Maintenance</p> <p>Special Services Center</p>	<ul style="list-style-type: none"> <li>* The mechanized systems used in the provisioning of equipment and facilities will help ensure equality of treatment in these areas. However, I will work orders for installation and maintenance of basic network services in an efficient, nondiscriminatory manner whether the Enhanced Service or CPE Provider is internal or external. <b>FOR EXAMPLE:</b></li> <li>* Expedited, on-line 'instant ordering service' may be provided for both internal and external CPE &amp; Enhanced Service Providers under the same terms and conditions.</li> <li>* Inventory tradeoffs and technical equality required in facilities provisioning will not discriminate, or favor, internal Enhanced Service Providers over external CPE and Enhanced Service Providers. Technical service characteristics and quality will be identical for like services.</li> <li>* While it may be necessary, at times, to reassign repair services priorities, no preference will be shown for answering the repair needs of internal Enhanced Service or CPE Providers.</li> <li>* In assigning priority to trouble reports, no favoritism will be shown for internal Enhanced Service or CPE Providers over external CPE or Enhanced Service Providers.</li> </ul>
Employees involved in the planning, sale, or marketing of enhanced services.	<ul style="list-style-type: none"> <li>* I understand ONA services have standard installation intervals which have been established to ensure equal treatment for all enhanced service providers.</li> </ul>

## **"What if?"**

You are the trouble dispatcher and all of your repair technicians are currently deployed. It seems a U S WEST Enhanced Service Provider operation has had a crisis, and needs immediate attention! As you are preparing to redeploy one of your repair technicians who is working on a routine case of trouble, you ask yourself, "I wonder if I'd be jumping this quickly if it were an external Enhanced Service Provider company?"

Write out an answer to yourself that reflects the principles of ONA.

### **Your "What If?" reply should be similar to ...**

"You bet I would!"

The fact that you have redeployed a repair technician from a routine repair job to a high priority repair call for an *internal* U S WEST Enhanced Service Provider means you would be doing the same thing for an *external* Enhanced Service Provider in the same situation. The nondiscriminatory provisioning Open Network Architecture safeguard requires it of U S WEST.



Refer questions to your Supervisor.

For additional **NONDISCRIMINATORY PROVISIONING** information, see the HELP LIST.

## **(E) NETWORK DISCLOSURE**

U S WEST must disclose information about planned changes to its basic network interfaces that affect Enhanced Service and Customer Premises Equipment Providers prior to making any such changes. This disclosure must be made at the **"make-buy" point - that is when a decision is made by U S WEST to change the basic network in a way that could affect network interfaces to Enhanced Service and CPE Providers.** A make-buy decision essentially involves revenue commitment and could include a decision to invest in a new enhanced or CPE service even though no financial commitment has been made concerning the new network interface. This includes changes that will or might affect their operations or impact the network functionality provided to them. The disclosure will ensure that all Enhanced Service and CPE Providers have nondiscriminatory access to critical network information which impacts their ability to provide service.

In the Open Network Architecture and CPE plans, U S WEST describes the procedures it will use for complying with the FCC's requirements. These requirements cover:

- \* when the decision to make a change to the network is disclosed.
- \* the type of information that is disclosed.
- \* how the information regarding network changes is disclosed.
- \* who monitors network disclosure procedures for U S WEST.

### **When is the decision to make a change to the network disclosed?**

The Enhanced Service Providers, CPE Providers and the Public must be notified of a decision to change the network. However, different timeframes apply for when the decision must be disclosed:

**NOTICE**  
TO THE  
ENHANCED SERVICE AND CPE  
PROVIDERS

MUST BE MADE

**AT THE "MAKE-BUY" POINT**

(WHEN A CORPORATE DECISION HAS BEEN MADE TO ADD, CHANGE OR REMOVE A FEATURE OR FUNCTION OF THE BASIC NETWORK THAT HAS THE POTENTIAL TO AFFECT ENHANCED SERVICE OR CPE PROVIDER INTERFACES OR THE USE OF THE NETWORK TO PROVIDE SERVICE.)

A NON-DISCLOSURE AGREEMENT MAY BE USED WITH A CPE OR ESP TO ENSURE THE PROTECTION OF PROPRIETARY INFORMATION, IF THE CHANGE WILL BE INTRODUCED MORE THAN 12 MONTHS FROM THE MAKE-BUY POINT.

**NOTICE**  
TO THE  
PUBLIC

MUST BE MADE

12 MONTHS PRIOR TO CHANGE  
OR

**AT THE "MAKE-BUY" POINT**

(IF THE CHANGE CAN BE MADE IN LESS THAN 12 MONTHS AFTER THE MAKE-BUY POINT.)

HOWEVER

**NOT LESS THAN 6 MONTHS**

NOTICE CAN BE GIVEN PRIOR TO ANY CHANGE TO THE BASIC NETWORK.

Examples of "make-buy" decisions which will require disclosure are:

\* **Approval of Major Business Case/Network Plan**

The formal documents that detail the development, approval and introduction of new interfaces or services to the network can constitute a make-buy decision.

\* **Vendor Selection Process**

The process used to select a vendor for a specific service or equipment deployment plan can constitute a make-buy decision. For example, 'vendor X-Y-Z' equipment was chosen to replace existing central office equipment. The replacement will introduce new network interfaces in this geographic area; therefore, the final vendor selection process will constitute a make-buy decision.

### \* **Corporate Directives**

An approved corporate business decision to offer a new enhanced service or CPE relying on a proposed change in the network interface will constitute a make-buy decision.

Because of the changing nature of technical trials, they will not automatically require network disclosure. However, when a technical trial is completed, and if a make-buy decision is made to make the arrangement permanent, disclosure will be required. Market trials without technical changes to the network do not require network disclosure. Conversely, if a market trial requires technical changes to the network, network disclosure is required once a Make-Buy decision is made.

It is important to remember that disclosure to CPE and Enhanced Service Providers **MUST** be made at the 'make-buy' point, regardless of the fact that it may be years before the actual change is implemented.

### **What Information is disclosed?**

A variety of information is disclosed including:

- \* name of the new interface
- \* location/locations of the offering
- \* timing of the offering

The technical information provided will be sufficiently detailed to permit the ESPs and CPE Providers to design services and equipment that will function with the basic network after the change.

### **How is the information regarding network changes disclosed?**

Two methods will be used to disclose the information to the CPE and Enhanced Service Providers:

- \* Direct mail notification.
- \* Access to the InterCONNECTIONS (ICONN) database.  
Note: Instructions to access ICONN are available through the Vendor Service Center (1-800-544-7126).

Public disclosure may be made through any of the following:

- \* U S WEST company publications and technical references
- \* trade shows and trade media
- \* industry meetings and seminars
- \* direct mail and press releases

### **Who monitors network disclosure procedures for U S WEST?**

The Network Planning organization will be the primary focal point for the Network Disclosure process because of its involvement in new technology deployment and participation on product teams.

Network Planners involved in basic network changes will be responsible for contacting the Network Disclosure Coordinator (303) 896-9025 to determine if a network change will require network disclosure. Product Managers, Product Developers and Product Support Managers who do not have a Network Planner on their Product Teams are required to contact the Network Disclosure Coordinator themselves. **Ultimately, however, all employees involved in network and product planning are responsible for meeting the obligations of Network Disclosure.**



## "What do I have to do?"

Network Planners	<ul style="list-style-type: none"> <li>* I will contact the Network Disclosure Coordinator if I am planning or preparing any changes to the network interface.</li> <li>* I am also aware that network disclosure timeframes can affect the deployment schedules of these new technologies.</li> </ul>
All Product Managers/ Developers  Enhanced Service or CPE Product Developers  Technical Operations Product Support & System Design Centers.	<ul style="list-style-type: none"> <li>* I will submit plans for new services and products to the Network Disclosure Coordinator for evaluation on Network Disclosure requirements before such plans are finalized.</li> <li>* In the absence of a Network Planner on my Product Team, I will notify the Network Disclosure Coordinator of 'make-buy' decisions that might require network disclosure.</li> <li>* I will include network disclosure timeframes in the planning intervals for new services and products.</li> <li>* I will address network disclosure in my business cases and/or product plans.</li> <li>* I understand that network disclosure applies to enhancements of existing services as well as new interfaces in the network.</li> <li>* I will include network disclosure timeframes in preparing customer bid responses, if necessary.</li> <li>* I understand that the information and procedures in this section apply to both Enhanced Services and Customer Premises Equipment.</li> </ul>
Sales Personnel	<ul style="list-style-type: none"> <li>* I need to understand that network disclosure requirements may impact intervals for the installation of new services to my customers. The Product Manager and/or Network Planner will be able to verify if these rules will apply.</li> </ul>

## **"What if?"**

The Product Team meeting has gone well! The new network changes will result in just what the customer needs! The new Network Planner is sure that the minor software changes can be done in a month. He looks at you, and says just that, and ends with, "So, we can implement these changes in a couple of months, and have the product ready to go in 3 months, right?"

Write out your reply to his question:

### **Your "What If?" reply should be similar to ...**

"No, if the changes to the basic network impact the network functionality provided to Enhanced Service Providers for the purpose of providing enhanced services, or it changes interfaces that affect the interconnection to CPE, then the change must be disclosed a minimum of six months prior to implementation. That amount of time will allow others to make plans for the changed network."

#### Note:

The Network Disclosure safeguard requires that U S WEST provide notice of network changes that will, or might, affect ESP operations or CPE operations. To determine if Network Disclosure obligations apply, the Network Planner should contact the Network Disclosure Coordinator. If the Network Disclosure Coordinator determines that these minor software changes WILL NOT affect ESP or CPE operations, the 3 month interval will be fine. If, however, it is determined that their operations WILL BE affected or that the changes affect the interfaces for the Providers, the minimum interval to implement these changes will be 6 months after network disclosure has been made.



Refer questions to your Supervisor.

For additional **NETWORK DISCLOSURE** information see the HELP LIST.

## **(F) ACCOUNTING - PART 64**

(REFERRED TO AS PART X ACCOUNTING)

**Part X** is an accounting safeguard established by the Federal Communications Commission (FCC) which provides the rules for the separation of costs of regulated telephone service from the costs of non-regulated activities ,e.g., customer premises equipment, customer premises wire and enhanced services. The FCC's primary objective with Part X is to establish a hierarchy of cost assignment and allocations which prevent the cross-subsidization of non-regulated activities by regulated services.

Product Planners and others who may become or are involved in planning a non-regulated service ,e.g., voice messaging, protocol conversion, etc., need to be aware of the impact Part X may have on a service offering.

**The following require special attention:**

- \* Part X applies to planning and deployment of non-regulated products and services.
- \* Part X has potential impacts upon business cases and financial analysis.
- \* Part X rules have timing impacts on the introduction of new non-regulated services or products.
- \* Part X applies to transactions or asset transfers between US West Communications and any of the non-regulated US West affiliates, such as US West Applied Communications, Inc.

## **IMPACT OF PART X TO A BUSINESS CASE or FINANCIAL ANALYSIS**

Part X cost allocation utilized a fully distributed costing methodology to assign costs between the nonregulated services and the regulated portion of U S WEST communications.

**The FCC's Part X rules require that U S WEST Communications methodology comply with the following:**

**\* Directly identify and assign costs to either regulated or nonregulated activities to the maximum extent possible.**

**\* Costs which cannot be directly assigned, are considered common costs. Common costs must then be allocated based in the following manner:**

- Direct measure of usage, or underlying activities (e.g., minutes of use or number of trunks.)
- Indirect measures of usage (e.g., allocate the maintenance of the investment based on minutes of use or number of trunks).
- Costs for which there is no direct or indirect measure of activity are called general overheads and are allocated to regulated and nonregulated activities based on the relative percent of all other costs assigned and allocated to each.

**U S WEST Communications' priority is to directly assign as many costs as possible to reduce the amount of costs that are allocated.**

This costing methodology may not be the same as you use today in assessing costs for new regulated basic network services. As a result, **the profitability analysis for the new service will be different.** Such financial analysis may also influence the distribution channel strategy, i.e., how you choose to market new CPE or enhanced services.

## **TIMING IMPACTS PART X RULES HAVE ON NEW ENHANCED SERVICES**

A Cost Allocation Manual (CAM) has been filed with the FCC. This manual outlines U S WEST Communications methodology for assigning and allocating costs under Part X. To offer new non-regulated services on an integrated basis, a Cost Allocation Manual revision may be required. If so it must be filed with the FCC. You must contact Regional Cost Accounting to determine if a revision to the Cost Allocation Manual is required.

**To ensure there is proper accounting for FCC Compliance purposes, the following require your attention:**

- Currently, U S WEST Communications policy requires that prior to any Cost Allocation Manual revision, a financial analysis for each new non-regulated service must be approved by:

Howard Doerr, Vice President and Chief Financial Officer  
AND

The Office of the Chair member representing the business proposal

- To file appropriate revisions with the FCC, the Regional Cost Accounting Group needs approximately 60 days to prepare the filing.
- If accounting cost pool revisions are filed, U S WEST Communications must wait 60 days prior to offering the new non-regulated service.
- Access tariffs may need to be amended to reflect any revenue requirement changes.

## **TIME REPORTING**

From an FCC compliance perspective, ***once planning begins*** for a new non-regulated service, ***your time and expenses*** associated with the enhanced service ***must be tracked and accounted for under***

***Part X.*** As soon as any product concept is sufficiently defined, review the new product or service with your Market Unit legal counsel, or their designated representative, to determine if it is considered a non-regulated service. Then, you must insure accounting procedures to properly track planning costs have been developed, and filed as part of U S WEST's Cost Allocation Manual.

If the new service is a non-regulated service, contact your Job Function Code (JFC) Departmental Coordinator. This person will advise you how to code your time, make appropriate JFC changes, etc.

<p>All individuals involved in planning, implementing, and/or selling new non-regulated, enhanced products or services must track their time in accordance with Part X rules.</p>
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## "What do I have to do?"

<p>Product Managers/Developers Market Managers, System Design Centers.</p> <p>Enhanced Services or CPE Product Planners</p>	<ul style="list-style-type: none"> <li>* I will contact my JFC departmental contact so that I can track my time on all new enhanced products and services in accordance with Part X Rules.</li> <li>* I will review with my Market Unit legal counsel to determine if the new product or service will be considered enhanced, once the new product or service has been sufficiently defined. I will do the same to determine if a proposed product is CPE.</li> <li>* I will develop, for each new enhanced or CPE product or service, a business case and/or financial analysis. For assistance I will refer to my Supervisor or the HELP LIST</li> <li>* I will review all new service plans for Cost with the Regional Cost Accounting Group to determine if Cost Allocation Manual changes are necessary.</li> <li>* I realize that Cost Accounting Manual and/or tariff filings might delay the offering of my product.</li> </ul>
<p>Regional Cost Accounting</p>	<ul style="list-style-type: none"> <li>* I will work with the ONA Market Unit Liaison Manager to ensure understanding of ONA product implications/prices when supporting the Market Unit financial analysis for new enhanced services.</li> </ul>

## **"What if?"**

**Anita** is really excited since she recently received the go-ahead for the development and public offering of a new service. Her product team believes they can get the service up and running in three months. What should she do next? What should your reply be?

### **Your "What If?" reply should be similar to ...**

If Anita hasn't already checked, her next step should be to contact her legal counsel, or designated representative, to **determine if the new service is enhanced, i.e., nonregulated**. If it is, then:

- \* She should contact the Regional Cost Accounting Manager responsible for her Market Unit. This manager will be her initial single point of contact for Part X issues, such as:
  - Timelines for planning, trial and deployment of new products.
  - Proper development of Business Cases and financial analysis.
  - Time reporting and Cost Allocation Manual updates.
- \* She needs to verify that a Comparably Efficient Interconnection (CEI) Plan has been approved. A CEI Plan must be approved by the FCC prior to any market deployment until U S WEST's ONA Plan is approved in full.
- \* Anita, and all her product team members, need to call their JFC Departmental Coordinator to make sure their planning time on this project is tracked accurately.
- \* She must recognize that it may be difficult to meet her three month deadline, depending upon the nature of the changes which the new product will have upon the Cost Allocation Manual, interstate revenue requirements, and the interstate access tariffs. She must also realize that Part X is not preemptive and, therefore, State Regulators might demand accounting and/or tariff adjustments which can create their own delays.



Refer questions to your Supervisor.

For additional **Part X** information see the **HELP LIST**.



## **(G) FCC ONA Service Requirements**

The basic principle of ONA is that U S WEST enhanced services will receive network access which is equal to that received by competitive non-U S WEST Enhanced Service Providers.

ONA services, the building blocks of Open Network Architecture, may be services U S WEST offers today, or may be new services that are developed to meet the needs of the Enhanced Service Provider Industry in the future.

ONA Services are network facilities (access arrangements) and unbundled features or functions, i.e., individual components with specific rates. ONA Services are available to all customers on equal terms and conditions. This includes all external and U S WEST Communication's Enhanced Service Providers. ONA Services include BSAs, BSEs and CNSs and are included in the following three service categories:

**Basic Serving Arrangements (BSA):** Fundamental tariffed switching and transport services that allow an enhanced service provider to communicate with its customers throughout the Bell Operating Company network. Examples of Basic Serving Arrangements include: Feature Group A, B, and D service and Basic Exchange Service, e.g., 1FBs and 1MBs.

**Basic Service Elements (BSE):** Optional, unbundled features that an enhanced service provider may require or find useful in the configuration of an enhanced services. Examples of Basic Service Elements include Message Delivery Service and Market Expansion Line ( i.e., remote call forwarding.)

**Complementary Network Services (CNS):** Optional unbundled basic service features that an end user may obtain from a carrier in order to access or to receive an enhanced service. Complementary Network Services are also services that the Bell Operating Companies offer, or will offer, to end users for a variety of applications, including enhanced service applications. Examples of Complementary Network Services are Call Waiting and Call Forwarding service.

**U S WEST may not provide its own enhanced service operations with special treatment in any of these three categories of services.**

**In accordance with U S WEST's ONA Plan and the FCC Computer Inquiry III requirements, all employees must adhere to the following ONA product and service guidelines:**

**ALL ONA SERVICES MUST:**

- Be available for purchase by any U S WEST customer. ONA services cannot be restricted from any particular 'class of residence, business or carrier customer'.
- Be available for use by all customers no later than the same date they are used with, or as part of, a U S WEST Enhanced Service offering.
- Be developed to meet the identified needs of all Enhanced Service Providers.
- Be available for testing purposes to all Enhanced Service Providers prior to the date the ONA service is offered for use with, or as part of, a U S WEST enhanced service offering.

**BASIC SERVICE ELEMENTS & COMPLEMENTARY NETWORK SERVICES MUST:**

- Be available to all customers on an unbundled basis; in other words, it cannot be offered only as a bundled service within an access arrangement or as part of a package of features.
- Be available at the same price and terms/conditions to all customers.
- Be available for resale; in other words, any U S WEST customer may purchase and resell the BSE or CNS to any other customer. However, this does not include the right to resell the underlying access arrangement.
- Be available for use with any access arrangement that is lawfully available to the purchaser and technically compatible with the feature. These features cannot be purchased by themselves; they must be utilized in conjunction with an end user access arrangement such as a 1FR, 1MB, etc. or with a BSA, also known as an Enhanced Service Provider access arrangement.

**Furthermore, all employees responsible for integrated enhanced service planning, development and delivery must adhere to the following ONA product and service guidelines:**

- If basic network abbreviated access methods, such as dialing or signaling, are offered or used by a U S WEST enhanced service operation, the same form of access must be available to all providers of enhanced services.
- U S WEST COMMUNICATIONS cannot use any basic network access arrangement, network feature, or central office function/facility in the provision or offering of an integrated enhanced service unless:
  - \* It is an unbundled ONA service; and,
  - \* It is available to all other customers under a tariff, price list, or catalog reference as an ONA service.
- U S WEST enhanced service operations cannot use packaged basic network features as part of their enhanced service offerings. An example of a packaged service offering is Telechoice.
- U S WEST enhanced service operations that require the use of new ONA services, that are not included in the approved ONA Plan, will not utilize such services until an amendment to the ONA Plan and/or to the specific CEI Plan is filed and approved by the FCC.

**In addition, the following steps must be taken before a new ONA service can be used by U S WEST in the provision or offering of an integrated enhanced service:**

- \* Enhanced Service Providers must receive notification of new ONA Services 90 days prior to U S WEST using them in conjunction with an Enhanced Service.
- \* State and/or FCC filings must be made and approved where applicable.
- \* Testing notification has been completed.

To meet the filing/notification requirement when you are involved in planning for a new enhanced service that requires (or potentially may require) a new Basic Service Element (BSE), Complementary Network Service (CNS), or Basic Serving Arrangement (BSA), contact the ONA Market Unit Liaison Manager listed on the HELP LIST

As new BSAs, BSEs, and CNSs are introduced, product training for these services will be delivered to all appropriate personnel.

Most recently, U S WEST commenced introduction of five ONA services for Enhanced Service Providers:

- \* Message Delivery Service
- \* Message Waiting Indication
- \* Call Forwarding Busy Line
- \* Call Forwarding Don't Answer
- \* Call Forwarding Busy Line/Don't Answer

These ONA Services may be used in conjunction with voice mail equipment so that Enhanced Service Providers may offer voice message services to residential and business customers.

**It is important to remember:**

ONA Services do not replace existing or new U S WEST product offerings, but rather, are unbundled network capabilities which are available in addition to packaged offerings.

**NEW ONA SERVICE REQUESTS** for BSAs, BSEs, and CNSs are vital to the development of new enhanced services for the customer, as well as to increase the utilization of the U S WEST network. To meet the needs of the Enhanced Services Industry, and satisfy our FCC Computer Inquiry III requirements, all ESP requests for new ONA services must be reviewed, using FCC defined service evaluation criteria, and a reply must be given to the requestor within 120 days.

**When an Enhanced Service Provider requests a new ONA service, their request must be documented and submitted immediately to the ONA Product Development Team, i.e., on the same day.**

**All requests should be submitted to the ONA Market Liaison Manager. (REFER TO HELP LIST, SECTION L)**

The U S WEST Service Request Application form should be used to submit any new ESP request for an ONA service. Please contact the ONA Market Liaison Manager for a copy of this form. (Note: New ONA service requests, that are received from non-U S WEST enhanced service providers, must not be shared with U S WEST personnel involved in enhanced services planning, sales or marketing.)

All Enhanced Service Providers submitting ONA Service requests will be:

- \* Contacted directly by the ONA Market Liaison Manager within 10 business days of the customer's request.
- \* Advised of the status of the request, which will include if the request will be:
  - processed as an ONA service candidate.
  - referred to a Market Unit for further development because it is outside the scope of ONA.

If the ONA service request qualifies as an ONA service candidate, the ONA product development team will conduct further product evaluation, and pursue development of a service to meet the request. Throughout this process, the ONA Market Liaison Manager will keep the customer, and the U S WEST customer contact person, informed of the progress and status of the FCC criteria assessment and development activities for the service request.

If the request is currently technically feasible and the requesting party has provided U S WEST with all of the necessary details such as a forecast of market demand, deployment requirements, timing, etc., U S WEST will respond to the requestor within 120 days with the following information:

- Whether U S WEST will provide the capability.
- When it will be available.
- The approximate price for the service based on the ESP's demand forecast.
- What technical problems, if any, need to be resolved.

When appropriate, U S WEST will agree to provide the service to the requestor on an individual contract basis (ICB), which includes a customer specific price, until full assessment of the FCC ONA service criteria evaluation can be obtained. Once this evaluation is complete, prices, deployment, and availability information will reflect the total marketplace needs and may be more attractive than the initial proposal.

Requests for services which do not meet the FCC ONA service criteria assessment will be referred to regular product development channels within U S WEST.

## "What do I have to do?"

All Sales and Marketing Personnel	<ul style="list-style-type: none"> <li>* I will document all requests from Enhanced Service Providers on the U S WEST New ONA Service Request Application, on the same day as received.</li> <li>* I will immediately send all ONA Service requests from Enhanced Service Providers to the ONA Market Liaison Manager listed on the HELP list.</li> </ul>
All Product Managers/ Developers involved in planning for Enhanced Services	<p>I will not market a new Enhanced Service which requires new underlying ONA services (BSE,BSA,CNS) until:</p> <ul style="list-style-type: none"> <li>* An ONA Amendment is filed for the new ONA services (90 days prior).</li> <li>* ESP notification has been made. (90 days prior.)</li> <li>* State/FCC filings have been made and approved.</li> <li>* Appropriate 'testing' notification has been made.</li> <li>* Cost Allocation Manual changes have been filed and approved, as necessary.</li> <li>* CEI Plan has been approved , i.e., this is an interim requirement until U S WEST receives full ONA plan approval.</li> </ul>

## **(H) PRICE PARITY**

In response to certain FCC requirements, U S WEST has committed to 'price parity' in its Open Network Architecture Plan. U S WEST internal Enhanced Service Provider operations will pay the same price for Basic Service Elements (BSEs), Complementary Network Services (CNSs), and Basic Serving Arrangements (BSAs) as external Enhanced Service Providers. The U S WEST internal ESP will not take a price advantage if/when it locates enhanced service equipment in a U S WEST central office.

Product Planners, Developers and others involved in the planning of enhanced services should also remember that the principle of price parity will affect their planning. When planning enhanced services, it is important to think of yourselves as 'across the street' - like an external Enhanced Service Provider would. Price parity means incurring basic network charges for your enhanced products as if you were sitting outside of U S WEST's central office. If a U S WEST internal ESP operation wanted to use a network access arrangement (BSA) that is priced based on distance from the central office - U S WEST must impute a 2 mile intraoffice mileage rate, even though its colocated. Price parity can be 'pictured' similar to this example:

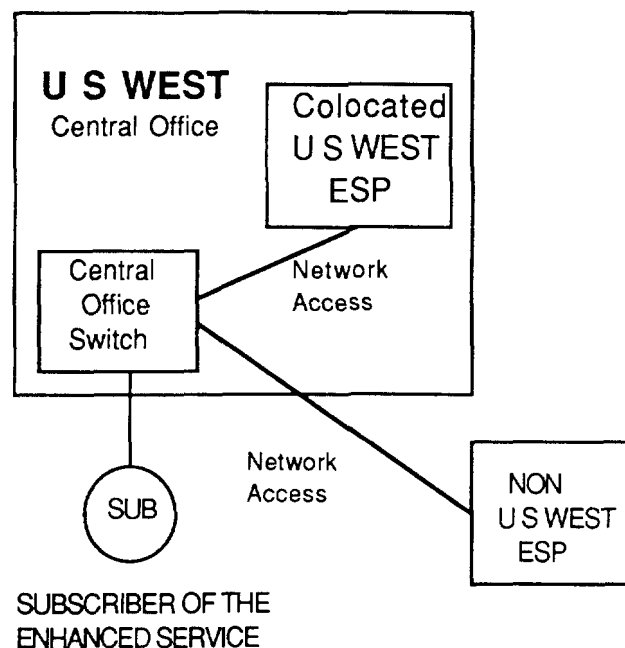
Both U S WEST and non-affiliated Enhanced Service Providers have to pay the same for the connection to the central office switch, even though one is actually located in a U S WEST Communications central office.

It is important to remember these specific price parity principles apply to any new enhanced service

U S WEST intends to offer.

If you are uncertain if the new product or service for which you are planning is 'enhanced,'

please contact your Market Unit legal counsel, who will work directly with the necessary FCC experts to determine if these rules apply.



Refer questions to your Supervisor.

For additional **PRICE PARITY** information contact the Market Unit Liaison on the HELP LIST.



## **(I) ONA MARKET AND TECHNICAL TRIALS**

As U S WEST develops new enhanced products and services, and new ways to provide them, there may be instances when either a market or technical trial will be necessary. Market trials may be required to test the marketability of a U S WEST enhanced service, product idea or concept. Technical trials may involve new network technology or network features in delivering U S WEST services. Technical trials may include network modifications, functionality, interface changes, etc.

### **Why Is This Important?**

The Federal Communications Commission set forth in Computer Inquiry III interim procedures for the Bell Operating Companies to follow if they desire to begin the unseparated (integrated, i.e., through one company) planning, research and development of enhanced services prior to full compliance with all Computer III safeguards. These procedures include trial notification, type of trial, scope, duration, etc. They are designed to provide external enhanced service providers with many of the same opportunities that U S WEST enhanced service providers may have.

### **Technical Trials**

Purely technical trials focus on the functional characteristics of the enhanced services, such as how the equipment works or how it interfaces with the network, rather than on the market characteristics of the service. Under Enhanced Services Research and Development Waivers previously granted by the FCC, U S WEST is permitted to engage in enhanced service technical trials without prior Comparably Efficient Interconnect (CEI) Plan approval, as long as the trials are for no charge, are of limited duration and geographic scope, have a limited number of participants, and are treated in accordance with the Part X Cost Accounting procedures. Other enhanced service providers must be afforded the opportunity to conduct their own technical trials.